

ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA) <u>Compliance Evaluation Inspection (CEI) Report</u>

1) Author of Report

Lanny Sasser

Environmental Scientist, Sr.

Compliance and Enforcement Section, Industrial Hazardous Waste Branch

Alabama Department of Environmental Management (ADEM)

1400 Coliseum Boulevard

Montgomery, Alabama 36110

2) Facility Information

Evonik

4201 Evonik Road

Theodore (Mobile County), Alabama 36582

EPA ID Number: NAICS Code(s):

ALD075045575

Telephone:

325199, 32518 (251) 443-4000

Website:

corporate.Evonik.com/en

3) Responsible Officials

Ms. Bonnie Tully, Vice President / Site Manager

Phone: (251) 443-4500

Email: bonnie.tully@Evonik.com

4) Inspection Participants

Mr. Bill Klutz, Environmental Manager – Evonik

Mr. Cecil Bolton, Jr., Hazardous Waste Specialist – Evonik

Mr. Javier Garcia - EPA

Mr. Lanny Sasser - ADEM

5) Date(s) of Inspection

March 22, 2018

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations



7) Purpose of Inspection

The purpose of the inspection was to determine Evonik's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

In 1974 the Degussa Corporation (Degussa), a wholly owned subsidiary of Degussa AG, Frankfurt, Germany; broke ground and began construction of the chemical production facility at the 4201 Degussa Road (North Site) location. The facility began chemical production operations in 1977. In 1980, Degussa notified US EPA Region 4 as a hazardous waste large quantity generator (LQG) and was assigned EPA ID # ALD075045575.

Kay-Fries Alabama (Kay-Fries), a wholly owned subsidiary of Huls America Inc. (Huls), built the chemical production facility on 164 acres located at 4301 Degussa Road (South Site). Kay-Fries notified US EPA Region 4 as a treatment, storage and disposal facility (TSDF) in 1980 and was assigned EPA ID # ALD000608224. Kay-Fries started manufacturing organic chemical intermediates for the pharmaceutical and chemical industries in 1981 and in the process began generating hazardous waste. During the early 1980s, several hazardous waste management units were in operation including the container storage area, the equalization basin, the aeration basin, the former sludge disposal site, the construction debris disposal site, and the hazardous waste incinerator. All of these units were subsequently closed under Department approved closure plans. Kay-Fries continued to operate as an LQG and was merged into Huls in December 1991. Huls changed the facility name in January 1998 to Creanova Inc. (manufacturing cyanoacetates, orthoesters, and coatings raw materials) and at the same time separated silicon (and silanes) manufacturing into a new company named Sivento Incorporated.

In March 1999, Huls and Degussa were combined into a new company named Degussa-Huls Corporation. In September 1999, the contiguous Degussa Corporation and Creanova sites became one facility with 1,000 acres in production located on 3,000 acres. The EPA ID number for Creanova (ALD000608224) was deactivated. (In November 1999, the Ultraform Company, which manufactured thermoplastic polyoxymethylene (a plastic marketed under the trade name Ultraform) separated from Degussa, notified and obtained US EPA ID number ALD000012518. By January 2004, that facility was no longer in operation, the building had been demolished and the EPA ID number was deactivated.)

In the 2007 notification, the name of the facility was changed to Evonik Degussa Corporation. In 2008, the quaternary ammonium-based (QUAB) chemical business unit, located within the North Site, became a separate entity named SKW QUAB Chemical Inc., notified and was assigned EPA ID number ALR000044057. The annual notifications remained essentially the same from 2007 through 2011. On November 28, 2012, the Department received a letter from stating that effective January 1, 2013 the name of the corporation would become Evonik Corporation. The letter further indicated that all operations and obligations of the company will remain the same.

Current Operations: Evonik manufactures commercial chemical products (primarily chemical intermediates) that are sent to off-site manufacturers for their use in the production of finished products.



Evonik operates five business units (BU) that include seventeen production lines:

- Advanced Intermediates BU has two production units: Hydrogen Peroxides, located on the North Site, and Sodium Methylate, located on the South Site.
- Inorganic Materials BU has five production units: Aerosil, AMEO (3-Aminopropyltriethoxysilane), NPS (Sodium Polysulfide), Silanes, and Si69; Silanes is located on the South Site and the other four are located on the North Site.
- Health and Nutrition BU has three production units: Methionine, Acrolein, and HCN (Hydrogen Cyanide); all three units are located on the North Site.
- Performance Polymers BU has two production units: MMAT (Methylmethacrylate Transitification) and Rohacell (super light insulation); both are located on the South Site.
- Coating and Additives has five production units: IP (isophorone), IPDI (IP di-isocyanate), IPN (IP nitrile), IPD (IP diamine), and PIC (Polyisocyanate). All five units are located on the South Site.

The facility currently employs 850 people and operates 24 hours a day 7 days a week. In its most recent notification of regulated waste activity (ADEM Form 8700-12), which was received by the Department on December 18, 2017, Evonik identified itself as a large quantity generator of hazardous waste; a used oil generator; and a small quantity handler of universal waste.

9) Observations

At approximately 9:00 a.m. on March 22, 2018, Mr. Garcia and I arrived at the facility and met with representatives of Evonik (Mr. Klutz and Mr. Bolton). At that time, we identified ourselves, discussed the purpose of the inspection, and reviewed applicable safety precautions. Following the opening conference, Mr. Klutz, Mr. Bolton and site personnel provided a tour of the facility, during which time we conducted the CEI.

A drive-through tour of Evonik identified the locations of the various production units. After the windshield tour, the following South Site production units and their associated satellite accumulation (SA) areas were inspected: (For details on some of the various production areas to follow refer to ADEM's eFile document "03807 ALD075045575 097 20090309 HWTM TR for Jan09 CEI")

A) MMAT Labs

Mr. Stephen Sumerlin, Plant Engineer, and Mr. Derek Everett, Day-Role Supervisor, joined us during our inspection of the MMAT Production Area. One 55-gallon and one 30-gallon SA drums along with hazardous waste storage tank S-434 were observed in this area. Both drums were closed, labeled and in secondary containment. Tank S-434 was appropriately labeled along with all piping associated with Subpart BB, its secondary containment was properly coated and appeared adequate.



No areas of concern were noted during this part of the inspection.

B) MMAT Production Unit

Two 55-gallon SA drums, one for liquid waste (MMA 003) and one for solid waste (MMA 005), were closed and properly labeled.

No areas of concern were noted during this part of the inspection.

C) Silanes Area

Three 55-gallon plastic SA drums (SIL 030, SIL 029 and SIL 007) were observed in this area. All drums were closed and appropriately labeled.

No areas of concern were noted during this part of the inspection.

D) Sodium Methylate Area

One 55-gallon SA drum labeled "SM Lab Waste" was observed closed.

No areas of concern noted during this part of the inspection.

E) Isocyanates Lab

One 55-gallon SA drum labeled "QC Lab Solvent Waste", one 55-gallon SA drum labeled "GC Vials: D001, 003, F005" and four 5-gallon SA containers labeled "Caustic Waste" were all observed in this area. All SA containers were closed and properly labeled.

No areas of concern were noted during the inspection.

F) PIC Warehouse

Mr. Mickey Lake, Production Specialist, and Mr. Heath Kinsey, PIC Outside Operator, joined us during this part of the inspection. One 55-gallon SA drum labeled "PIC-010 (Polyisotionates)" was observed in this area. The drum was closed and appeared to be full. An accumulation start date of March 21, 2018, was on the drum. Evonik had twenty-four more hours to move the SA drum into their central accumulation area.

No areas of concern were noted during this part of the inspection.

This concluded the guided inspection of the South Site. Evonik's perimeter fence and signage were inspected while driving between the South and North Sites, no areas of concern were noted. After lunch, the following production areas on the North Site were inspected:



G) AMEO Plant

Mr. AL Bedford, Superintendent, Mr. Steve Garner, Day Resources, and Mr. Wayne Embree, Assistant Superintendent, accompanied us during this part of the inspection. Two 10,000-gallon Hazardous waste storage tanks (S-457130 and S-457120) and one 55-gallon SA drum (AMEO 06) were observed in this area. The SA drum was labeled and closed. Both tanks had appropriate secondary containment. Tank S-457130 was labeled with the hazardous waste codes "D001" and "F005" and all Subpart BB piping was tagged. Tank S-457120 was not in service at the time of the inspection. The daily inspections for tanks S-457130 and S-457120 were reviewed in the AMEO control room.

No areas of concern were noted during this part of the inspection.

H) NPS Area

Mr. Don Martin, Acting Area Superintendent, escorted us during this part of the inspection. Two 55-gallon and one 30-gallon SA drums were observed. All drums were closed and appropriately labeled.

No areas of concern were noted during this part of the inspection.

I) Acrolein cyanohydrin-o-acetate (ACA) Area

This area began operation around February 2017. ACA is produced in this area through a manufacturing process that occurs in a series of different reactors and tanks. Mr. Chris Mitchell, Superintendent, accompanied us during this part of the inspection. One 7000-gallon 90 day hazardous waste storage tank (V-4510) was observed during the walk-through. It was labeled "D001", "D002" and "D003". Secondary containment appeared to be well maintained and appropriate for a tank that size and all Subpart BB piping was tagged. The LDAR inspection records for V-4510 were received by the Department via email on March 27, 2018. Daily inspection records for V-4510 were reviewed in the ACA Lab. No areas of concern were noted during the inspection of tank V-4510.

Three SA 30-gallon drums were also observed in this area. They were labeled "TEA Waste", "ACA 006: Contaminated Solids" and "ACA 00655: Contaminated Metals". All drums were closed and appropriately labeled.

No areas of concern were noted during this part of the inspection.

J) ACA Lab

Ms. Nicolle Rayburn, Lab Coordinator, joined us for the inspection of the lab. The following SA containers were observed in the ACA Lab:



- 1) One 5-gallon container that was closed and labeled "Silver Nitrate".
- 2) One 2-gallon container that was open and labeled "ACA 006: Contaminated Materials". This SA container was closed during the inspection.
- 3) One 2-gallon container that was closed and labeled "ACA 006 Waste".
- 4) One 5-gallon container that was closed and labeled "ACA 010: Process Sample Waste".
- 5) One 5-gallon container that was closed and labeled "ACA 004: Lab Organic Waste".
- 6) One sharps container closed and labeled "ACA 006: ACA Waste and Sharps".

No areas of concern were noted during this part of the inspection.

K) Hazardous Waste Warehouse

The corrugated metal building was locked, had appropriate signage and sloped / coated secondary containment. Approximately 60 hazardous waste storage containers, ranging in size from 5-gallon buckets to 55-gallon drums, were observed during the inspection. All containers were in good condition, closed and labeled with all required information. One 55-gallon SA drum for "Corrosives" and one 30-gallon SA drum labeled "Decsil Kits: D006" were also observed to be closed. Two universal waste (UW) containers, one for 8 ft. UW lamps and one for 4 ft. UW lamps, were closed, labeled and dated with the accumulation start date.

No areas of concern were noted during this part of the inspection.

L) HCN Production Unit

A locked SA igloo contained one 55-gallon SA drum that was closed and labeled "ACH Waste".

No areas of concern were noted during this part of the inspection.

M) Paint Shop

One 55-gallon SA drum was present in this area. The drum was closed and labeled "Waste Paint Thinner".

No areas of concern were noted during this part of the inspection.



This concluded the facility walk-through portion of the inspection. Evonik provided a conference room for the facility record review. The following documents were reviewed at this time: Evonik's Biennial Report, ADEM Form 8700-12, outbound manifests (for wastes shipped off-site by Evonik), records of inspections of Evonik's hazardous waste storage area, records of inspections of Evonik's hazardous waste storage tanks, inspection and maintenance logs for units subject to Subpart BB, tank integrity tests, the facility's contingency plan, records of hazardous waste management training provided to Evonik's employees, job titles / descriptions for employees that manage hazardous waste.

The inspectors' review and evaluation of these documents revealed the following:

- Mr. Lake, Mr. Martin and Ms. Rayburn's training records were not available for review at the time of the inspection.
- Evonik could not provide documentation that their contingency plan had been submitted to the local emergency authorities.
- Some of the inspection and LDAR records for tanks S-434, S-7130 and V-4510 were not available for review. These inspection records were provided to me via email on March 27, 2018.

10) Summary

Based on the observations made during the inspection, Evonik appears to be large quantity generator of hazardous waste; a used oil generator; and a small quantity handler of universal waste. The following areas of concern were noted at the time of the inspection:

- Training records for Mr. Lake, Mr. Martin and Ms. Rayburn were not available for review. Mr. Lake's and Mr. Martin's training records were not available for review at the time of the inspection due to an error when sorting the information to be included on the training record spreadsheet. Mr. Lake's and Mr. Martin's training records were provided to the Department via email on March 28, 2018. Ms. Rayburn was hired by Evonik in December 2016 and had been receiving hazardous waste handling instructions from Mr. Bolton before the classroom training she received on March 26, 2018.
- Local emergency arrangements / notifications were not available for review. Evonik had been instructed by local authorities not to submit their contingency plan. Evonik has a fully equipped medical facility, emergency response team and fire department with EMTs on-site that is available 24/7/365. Documentation demonstrating the contingency plan had been submitted to local authorities was provided to me via email on March 28, 2018.

At the conclusion of the inspection, the inspectors held a closing conference with representatives of Evonik (Mr. Klutz and Mr. Bolton). During the meeting, the inspectors reviewed and discussed their observations, presented their findings to Evonik's representatives, and provided Evonik's representatives with an opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing the areas of concern listed above. Mr. Klutz accepted the report on behalf of



Evonik. The inspectors concluded the closing conference and departed the site at approximately 4:00 p.m.

11) Signed

Compliance and Enforcement Section, Industrial Hazardous Waste Branch

Land Division

April 30, 2018

Date

12) Concurrence

Brent A. Watson, Chief

Compliance and Enforcement Section, Industrial Hazardous Waste Branch

Land Division

April 30, 2018

Date

Attachments:

A) Preliminary Inspection Report



ATTACHMENT A: Preliminary Inspection Report



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT PRELIMINARY INSPECTION REPORT

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